



4. This Court has original jurisdiction over plaintiff's federal action pursuant to 28 U.S.C. §1343. Accordingly, defendant is entitled to remove the action to this Court pursuant to 28 U.S.C. § 1441.

5. This Notice of Removal is being filed within 30 days after receipt of plaintiff's state court complaint by defendant, as required by 28 U.S.C. § 1446(b).

6. Copies of this Notice of Removal will be duly filed with the Prothonotary of the Court of Common Pleas of Clearfield County and served upon plaintiff.

7. In removing this action, defendant does not waive his objections to defects in service or improper service, or any defenses, including without limitation, defenses available by virtue of the Eleventh Amendment to the United States Constitution or under the Pennsylvania Sovereign Immunity Act.

Respectfully Submitted,

**JOSH SHAPIRO**  
Attorney General

By: /s/ Sarah J. Simkin

Sarah J. Simkin  
Deputy Attorney General  
Pa. I.D. # 320646

Date: January 29, 2020

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was filed electronically and will be served via First-Class Mail, postage prepaid upon plaintiff as set forth below upon receipt of the federal docket number:

**Margaret M. Jager and Robert W. Jager**  
**1181 Pleasant Valley Road**  
**Woodland, PA 16881**  
**(Plaintiffs)**

/s/ Sarah J. Simkin  
Sarah J. Simkin  
PA ID # 320646

Dated: January 29, 2020